



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

April 14, 2023

**BY ECF**

The Honorable Valerie E. Caproni  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *Reclaim the Records and Alec Ferretti v. United States Department of State*,  
No. 23 Civ. 1529 (VEC)

Dear Judge Caproni:

This Office represents defendant the United States Department of State (“State Department”) in the above-referenced action brought pursuant to the Freedom of Information Act (“FOIA”). On behalf of the government, I write respectfully to request a sixty-day extension of the time to respond to the complaint (*i.e.*, from April 19 to June 19, 2023).

This is the first request to extend that deadline. As the government has advised plaintiffs, the State Department is in the process of evaluating whether there are any records potentially responsive to plaintiffs’ FOIA request. Thereafter, it is anticipated that the parties will confer regarding next steps. Plaintiffs consent to the requested relief.

We thank the Court for its consideration of this letter.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney for the  
Southern District of New York  
*Attorney for Defendant*

By: /s/ Joseph A. Pantoja  
JOSEPH A. PANTOJA  
Assistant United States Attorney  
86 Chambers Street, 3<sup>rd</sup> Floor  
New York, New York 10007  
Tel.: (212) 637-2786  
Fax: (212) 637-2750  
E-mail: joseph.pantoja@usdoj.gov

cc: Plaintiffs’ counsel (by ECF)